

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

EDDIE BERNICE JOHNSON, *et al.*,

Plaintiff-Intervenors,

v.

GREG ABBOTT, *et al.*,

Defendants

Case No. EP-21-cv-00259-DCG-JES-JVB
[Lead Case]

&

All Consolidated Cases

**SECOND AMENDED NOTICE OF
STATE DEFENDANTS' DEPOSITION DESIGNATIONS**

Defendants Greg Abbott, in his official capacity as Governor of Texas, Jane Nelson in her official capacity as Secretary of State of Texas, and Dave Nelson, in his official capacity as Deputy Secretary of State (State Defendants), respectfully submit the following second amended designations of deposition testimony, pursuant to Federal Rule of Civil Procedure 26(a)(3).

State Defendants offer this testimony by deposition pursuant to Federal Rule of Civil Procedure 32(a)(3) and (4) because the witnesses are adverse parties, are located more than 100 miles from the place of trial, or could not attend or testify because of age, illness, or infirmity.

State Defendants reserve the right to amend or supplement these designations in response to designations or testimony that Plaintiffs may offer at trial. Should any of the witnesses whose testimony is designated herein testify live during the remainder of trial, State Defendants ask the Court to consider those witnesses' deposition designations to be withdrawn.

Further, State Defendants intend to waive no privilege in these designations. To the extent any designated testimony is protected by the legislative privilege, or any other privilege, such designation is inadvertent, and State Defendants will withdraw such designations should they become aware of the privilege.

Last, State Defendants incorporate by reference all testimony, both live testimony and testimony made via trial depositions, offered at the Preliminary Injunction hearing that took place from January 25, 2022 to January 28, 2022 and offer that testimony as support in addition to the below designations. Further, State Defendants offer this testimony to supplement its Deposition Designations filed on May 7, 2025, and First Amended Deposition Designations, filed on May 8, 2025, and to the extent necessary, incorporate those designations by reference.

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I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on May 16, 2025, and that all counsel of record were served by CM/ECF.

/s/ Kathleen T. Hunker
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